UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 3 1 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7642 3021
RETURN RECEIPT REQUESTED

Mr. Bob Erickson
EHS Director
Quality Paint and Coatings
2236 Clairville Road
Oshkosh, Wisconsin 54904

Re: Notice of Violation
Compliance Evaluation Inspection
WI0 001 003 078

Dear Mr. Erickson:

On January 31, 2017, a representative of the U.S. Environmental Protection Agency inspected Quality Paint and Coatings, Inc. located in Oshkosh, Wisconsin (hereinafter "QPC," "facility," or "you"). As a large quantity generator of hazardous waste, QPC is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate QPC's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by QPC, EPA's review of records pertaining to QPC, and the inspector's observations, EPA has determined that QPC has unlawfully stored hazardous waste without a license or interim status as a result of QPC's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1) - (3). EPA has identified the license exemption requirements violated by QPC in paragraphs 1 - 3, below.

Also, EPA has determined that QPC violated RCRA requirements related to hazardous waste determinations and universal waste as described in paragraphs 4 and 5, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, QPC violated the following large quantity generator license exemption requirements:

1. Content of Hazardous Waste Contingency Plan

Under Wis. Admin. Code §§ NR 662.0034(1)(d) and 665.0052(5) and (6) [40 C.F.R. §§ 262.34(a)(4); 265.52(e) and (f)], a large quantity generator shall maintain a hazardous waste contingency plan that includes an up-to-date list of all emergency equipment at the facility such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. Additionally, the contingency plan must include an evacuation plan that describes the signal(s) used to begin evacuation, evacuation routes and alternate evacuation routes.

At the time of the inspection, QPC's hazardous waste contingency plan indicated that an evacuation plan for the facility was available but the contingency plan copy that was reviewed did not contain the relevant information. QPC's hazardous waste contingency plan also listed the emergency response equipment available on site but did not provide the location of the equipment or a brief outline of its capabilities. In follow-up communication, QPC provided a diagram of the facility that detailed evacuation routes and the location of emergency equipment. However, the diagram did not contain the level of detail required above. QPC, therefore, is in violation of the above license exemption requirements.

2. Contingency Plan Amendment

Under Wis. Admin. Code §§ NR 662.0034(1)(d) and 665.0054(3) [40 C.F.R. §§ 262.34(a)(4); 265.54(c)], a large quantity generator must amend its hazardous waste contingency plan whenever the design or operation of the facility changes in a way that could change the responses necessary in an emergency.

At the time of the inspection, QPC's hazardous waste contingency plan detailed the location of its previous less than 90-day hazardous waste storage area. That storage area had been taken out of service as a result of changes made to the facility design and operation. QPC now operates a temporary less than 90-day hazardous waste storage area in its South Building until a permanent storage area is constructed. QPC had not updated its contingency plan to reflect the new hazardous waste storage area. QPC, therefore, violated the above license exemption requirement.

3. Personnel Training and Recordkeeping Requirements

Under Wis. Admin. Code §§ NR 662.0034(1)(d) and 665.0016(3) and (4) [40 C.F.R. §§ 262.34(a)(4); 265.16(c) and (d)], a large quantity generator must provide its employees, after an initial training session, annual training sessions that review hazardous waste management procedures and contingency plan implementation for relevant facility

personnel. Records of the annual training sessions must be maintained on site until closure of the facility and, for former employees, for at least three years from the date the employee(s) last worked at the facility.

At the time of the inspection, records related to the hazardous waste management training requirements above were not readily available and QPC employees indicated that training records for on-site employees were maintained at a separate location. In follow-up communication, QPC presented records related to hazardous waste training sessions occurring on November 12, 2015 and February 3, 2017. There were no records indicating training sessions had occurred in 2014 or 2016. QPC, therefore, is in violation of these license exemption requirements.

Summary: By violating the requirements for a license exemption, above, QPC became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. QPC failed to apply for such a license. QPC's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

4. Hazardous Waste Determinations

Under Wis. Admin. Code § NR 662.0011 [40 C.F.R § 262.11], a generator of a solid waste, as defined in s. NR 661.02 [40 C.F.R. § 261.2], shall determine if that solid waste is a hazardous waste using the following method:

i. The generator may first determine if the waste is excluded from regulation under s. NR 661.04 [40 C.F.R. § 261.4];
ii. The generator must then determine if the waste is listed as a hazardous waste in subchapter D of chapter NR 661 (lists of hazardous wastes) [subpart D of 40 C.F.R. part 261];
iii. If the waste is not a listed hazardous waste, the generator must then determine whether the waste is identified in subchapter C of chapter NR 661 (characteristics of hazardous waste) [subpart C of 40 C.F.R. part 261] by testing the waste using approved laboratory methods or applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

QPC operates a chromium conversion coating dip tank as part of a pre-treatment process for components that are to be coated. At the time of the inspection, QPC could not provide information related to a hazardous waste determination for the chromium dip tank solution when that material is determined to be a waste and removed from the tank. Analytical testing performed by Badger Laboratories of Neenah, WI on February 14,

2017 indicated that the chromium dip tank solution had a total chromium content of 124 milligrams per liter. Because the chromium dip tank solution is a liquid, the total chromium content analytical result may be used in lieu of the chromium content that would be obtained from a Toxicity Characteristic Leaching Procedure (TCLP) analysis. The TCLP limit for chromium is 5 milligrams per liter, above which a material is considered a D007 characteristic hazardous waste. Based on this information, EPA believes that QPC failed to make a proper hazardous waste determination on its chromium dip tank solution, and is in violation of the above requirement.

5. Universal Waste Lamp Management

Under Wis. Admin. Code §§ NR 673.13(4) and 673.14(5) [40 C.F.R. §§ 273.13(d) and 273.14(e)], a small quantity handler of universal waste lamps must contain lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. The containers or packages must be kept closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. Additionally, the small quantity handler must label or mark clearly each container or package of universal waste lamps with the phrase "Universal Waste – Lamps," "Waste Lamps," or "Used Lamps."

At the time of the inspection, QPC was accumulating universal waste lamps in several boxes on top of the southern-most paint booth in its North Building. All of the boxes were open and it was unclear which lamps may have been used and which were new. The way in which the lamps were stored made them inaccessible and it was unclear if any of the containers were labeled as required. In follow-up communication, QPC provided photographs displaying the universal waste lamps had been removed from their current storage location, shipped off-site, and that pre-labeled boxes had been purchased that meet the labeling requirements above. Thus, no further action is necessary to comply with this requirement.

At this time, EPA is not requiring QPC to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with the requirements for a license exemption outlined in paragraphs 1 - 3, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken to establish compliance with the above license exemption and waste determination requirements. You should submit your response to Mr. Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-17J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

for Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WDNR, michael.ellenbecker@wisconsin.gov

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:	January 31, 2017
SITE NAME:	Quality Paint and Coatings
ADDRESS:	2236 Clairville Road Oshkosh, Wisconsin 54904
EPA ID NUMBER:	WI0 001 003 078
GENERATOR STATUS:	Large Quantity Generator (2015)
NAICS CODE:	33281 Coating, Engraving, Heat Treating and Allied Activities
FACILITY CONTACT:	David Knepfel Director of Environmental Health and Safety
EPA INSPECTOR:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: Brian Kennedy — 2/22/2017
Brian Kennedy — **Date**

APPROVED BY: _____ — 2/28/17
Julie Morris, Chief — **Date**
Compliance Section 2

Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of Quality Paint and Coatings (hereinafter QPC or facility) located at 2236 Clairville Road, Oshkosh, Wisconsin took place on January 31, 2017. The CEI was conducted by U.S. Environmental Protection Agency personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Wisconsin Administrative Code and the Code of Federal Regulations. Specifically, the CEI was an evaluation of QPC's compliance with the regulations governing large generators of hazardous waste. Representatives of the Wisconsin Department of Natural Resources declined to attend the inspection.

Participants

The following persons were present for part or all of the inspection:

Chuck Nelson – President and CEO	QPC
Todd Beck – Director of Business Development	QPC
David Knepfel – EHS Specialist (by phone)	QPC
Bob Erickson – Former EHS Manager	QPC
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:00 AM CST and entered the front office. I stated the purpose of my visit, presented my enforcement officer credentials and requested to see an environmental coordinator. I was told that the former EHS Manager on site, Mr. Bob Erickson, had recently retired and his replacement, Mr. David Knepfel, was currently out of the office. Shortly thereafter, Mr. Todd Beck, QPC's Business Development Director, and Mr. Chuck Nelson, QPC's President, arrived and escorted me into an office for an opening conference. I presented Mr. Nelson my enforcement officer credentials and business card and provided him the Small Business Resource and Pollution Prevention information sheets. Mr. Nelson called Mr. Knepfel, QPC's new EHS Specialist, in on a conference line to join the meeting. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a site tour that would involve photographs as well as a review of records pertaining to hazardous waste.

I informed Mr. Nelson and Mr. Beck of QPC's right to claim certain information or documents collected during the inspection as confidential business information.

Site Description

The following information about QPC is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text, unless otherwise specified.

QPC provides painting and specialty coating services for both commercial and military vehicles and equipment. QPC's coatings are specialized compositions of urethanes, epoxies, and polyureas intended to provide protective weatherproofing and chemical and physical wear resistance. As summarized on its website (http://www.qualitypaintcoatings.com/begin.html): "QPC offers a wide range of services, including wet paint and coatings, dip coatings, specialty coatings for traction applications, high durability protective coatings, and even bullet resistant coatings. We also offer fabrication and welding services, and assembly / disassembly and retrofit services." QPC offers surface preparation prior to coating through shot blasting and chrome and zinc phosphate dipping. Paints and coatings are applied manually in several paint booths throughout the site with the use of paint spray guns. Paint and coating batches are formulated based on customer requests and colors are generally mixed on site. No heating of ingredients is conducted on site.

QPC originally opened in 1989 as an automotive collision repair shop but has since specialized in only painting and coating services. QPC has a total of 85 employees in management and production floor positions. First production shift starts at 7 AM and lasts until 3:30 PM, while a second skeleton shift begins at 3:30 PM. Operations are generally Monday through Friday. QPC is comprised of a North and South Building. The North Building contains administrative offices and three painting areas, while the much larger South Building contains most of the blasting operations, additional painting booths and bake ovens. A standalone blast bay is also located southeast of the South Building. QPC has recently expanded its production floor by constructing additional space on the east end of the South Building. This expansion will provide space for additional blasting machinery, administrative offices and conference rooms. Standalone trailers south of the South Building are being used for office space in the interim. The expansion will eventually allow QPC to move all production to its Clairville Road facility, removing the remaining production capacity and corporate offices it has at a second location in Pickett, Wisconsin.

QPC's primary hazardous waste streams are waste paint related materials, cleaning solvents and paint and solvent-contaminated rags. Waste paint related materials include liquid paint and liquid paint-containing materials generated during painting and cleaning operations. Examples include off-specification paint batches and excess paint from batch mixes. QPC has characterized this material as D001 (ignitable) hazardous waste and it is usually shipped off-site to Safety-Kleen in New Castle, Kentucky for fuel-blending. Cleaning solvents are used to purge the lines in QPC's paint spray guns. QPC uses a special solvent blend called Hydrite RCLT to clean these lines and accumulates the material in satellite areas in and around paint booths as "waste thinner." QPC has characterized the waste cleaning solvent as F003 and F005 hazardous waste and it is usually shipped off-site to WRR Environmental Services in Eau Claire, Wisconsin. QPC uses rags and wipes to clean components and equipment and in the process contaminates them with various solvents. These rags are accumulated on site as F003 and F005 hazardous waste.

QPC currently accumulates the hazardous waste described above in an interim 90-day storage area on the South Building production floor. Previously, QPC maintained a 90-day storage area in an outdoor shed but has since taken it out of use in conjunction with the expansion project. QPC is currently constructing a concrete containment system south of the South Building on which a new 90-day hazardous waste storage area will be constructed.

QPC generates several other waste streams on site. The chromium and zinc phosphate dip tank solutions are occasionally changed and regenerated. Waste solution from this process is drained into outdoor underground storage tanks south of the South Building. The tanks have capacities of 4,200 and 5,000 gallons, respectively. This waste solution is shipped to Covanta Environmental Solutions, a centralized wastewater treatment facility, as a non-hazardous waste. Shot blasting dust is collected on site via several dust collection systems. This material is periodically shipped off-site for disposal and has been characterized as non-hazardous waste. Universal waste lamps are collected on-site prior to removal by Safety-Kleen. As part of its expansion project, QPC is investing in LED lamps and will generate waste lamps as the project proceeds. Used oil is generated by company forklifts but is currently collected at the company's Pickett facility. No used oil is currently managed at the Clairville Road facility.

Site Tour

Mr. Beck led the initial site tour of the facility. The tour began in the production area of the North Building, where QPC has three paint booth areas and a paint mix room. In the paint mix room several QPC employees were creating a paint batch. Along the east wall of the mix room was a satellite accumulation area where two 55-gallon drums were accumulating "Waste Thinner" and "Waste Paint" (See Photo 1 in Attachment A: Inspection Photographs). Both drums were labeled as hazardous waste and grounded. The bung funnel attached to the "Waste Paint" drum was slightly open during the tour. The mix room contained a variety of other paints and chemicals used for custom batch mixing. No other waste was observed in the room.

The tour continued to the southern painting booth in the North Building where a QPC employee was prepping equipment for painting. Mr. Beck explained that the pumping system used to supply paint through the paint spray guns is also used to pump waste thinner (or purge solvent) for cleaning purposes. This purge solvent is generally accumulated in five-gallon satellite accumulation buckets before being consolidated into 55-gallon drums.

In the west booth of the North Building, Mr. Beck explained the painting process in more detail. A large in-ground opening in the center of the paint booth allows workers to paint the undersides of vehicles and equipment. The booth had a large ventilation system which draws paint particles and fumes out of the air during work. The large paint filters that covered the exhaust vents were made of a fiber mesh that increases the surface area of particle capture. The filters in the room were stained with paint colors. Mr. Beck stated these filters are changed out about once per week and, when dry, are disposed of as non-hazardous waste.

Mr. Beck led the tour into the South Building which houses all of QPC's military vehicle and equipment coating space and additional commercial coating space. On the west side of the building he pointed out a blast bay and wash bay where equipment is manually blasted to create a uniform coating surface and washed to remove grime that could affect the coating process. The southwest corner of the building housed a large paint booth with a paint pump control system along the southern wall. Near this pumping system was an unlabeled five-gallon bucket of waste thinner purge solvent. Mr. Beck directed an employee working near the booth to apply a label to the bucket. Just east of this area along the southern wall was QPC's interim 90-day hazardous waste storage area. At the time of the tour there were three 55-gallon drums of waste, all of which were labeled as "Waste Thinner" (See Photo 2). The earliest date observed was January

17, 2017. All drums were labeled as hazardous waste. A fire extinguisher was attached to a shelving unit adjacent to the drums and had last been serviced in May of 2016.

At this time during the tour, Mr. Bob Erickson, QPC's former environmental manager, arrived on site and introduced himself. Mr. Nelson also joined the tour. Mr. Erickson explained the reasoning for storing the hazardous waste in this area while the permanent 90-day storage area was under construction. I asked Mr. Erickson if there was a spill kit or absorbents nearby. He led the tour to a small fire-proof paint storage room at the south side of the South Building where a yellow barrel was labeled as containing spill control equipment. However, the barrel did not contain spill control equipment. Mr. Erickson stated that spill control kits were located in other areas of the production floor. In the same paint storage room QPC maintains a satellite accumulation area for a nearby paint line. This accumulation area at the time of the tour held three 55-gallon drums, two of which were labeled as "Waste Thinner" and one as "Waste Paint" (See Photo 3). Mr. Erickson stated that one of the waste thinner drums was likely full and would be moved to the interim 90-day storage area shortly. All three drums were labeled as hazardous waste and closed.

The tour continued through the painting line adjacent to the paint storage room along the southern wall. At the east end of the line Mr. Erickson pointed out one of the several portable spill kits located throughout QPC. East of this painting line was QPC's dip line, where metal components are dipped in tri-valent chrome (for aluminum) or zinc phosphate (for steel) solutions to prep them for coating. Mr. Beck led the tour through the dip tanks and explained that they are drained to outdoor storage tanks when the solutions are spent. No wastewater treatment is conducted on site and city sewerage lines are not available at QPC's location.

Mr. Nelson and Mr. Beck next led the tour through QPC's military vehicle coating lines in the center of the South Building. Mr. Nelson explained the proprietary coating being applied to the vehicle equipment that is able self-seal itself when struck by bullets or other projectiles. The application is particularly useful for fuel and water tanks as it is able to stop leaks within several minutes of puncture. No hazardous waste was observed in the military coating areas as the coatings utilized there are dry-applied or water-based.

The tour moved to the northern wall of the South Building near a small cleaning area. There was a small red satellite accumulation container of solvent contaminated rags. The container was labeled as hazardous waste and closed. QPC is unable to launder its solvent-contaminated rags because much of their coatings contain catalysts that are not amenable to commercial cleaning.

The tour continued into the newly-constructed production areas on the east side of the South Building. Mr. Nelson pointed out new office and conference spaces that were being actively finished, as well as new painting areas and drying ovens. Mr. Nelson also demonstrated a new automated blasting machine. No hazardous waste was observed in the new production space.

The tour moved outside the east side of the South Building to view a dust collector attached to the new blasting machine. The dust collector does not actively collect dust, but periodically drums are placed underneath the baghouse to collect accumulated dust. No dust containers were in the area during the tour. The tour continued around the south side of the South Building. Mr.

Erickson pointed out the standalone blasting bay as well as a newly constructed bridge that connects QPC's northern property to the company parking lot. Mr. Erickson pointed out the new concrete berm south of the bridge where the permanent 90-day hazardous waste storage area would be placed.

The tour concluded back in the North Building where QPC was storing universal waste lamps. The lamps were accumulating on top of the southern-most paint booth and did not appear to be well-containerized. The used lamps appeared to be accumulating near new lamps, but it was unclear which was which. It was also unclear which containers were labeled or dated because the lamps were inaccessible (See Photo 4).

Record Review

Mr. Erickson was able to provide a variety of records in the office trailer south of the South Building. Hazardous waste manifests were reviewed for years 2014 through 2016, as well as hazardous waste annual reports submitted to the WDNR for years 2014 and 2015. Hazardous waste shipments reviewed were commonly sent to Safety-Kleen locations in New Castle, KY and Dolton, IL, WRR Environmental Services in Eau Claire, WI, and Clean Harbors in El Dorado, AR. Land disposal restriction notifications were reviewed along with manifest shipments. Waste profiles for solvent-contaminated rags and waste cleaning solvent (thinner) were reviewed.

A training certificate from 2015 indicated that Bob Erickson had taken hazardous waste management training presented by the Hydrite Chemical Company. Mr. Erickson stated he had previously provided training to QPC employees but records of internal training sessions were not readily available.

QPC's hazardous waste contingency plan was reviewed. The emergency coordinators listed in the plan had been updated since Mr. Erickson's recent retirement. Mr. Knepfel was now listed as the primary coordinator. The plan detailed the location of the previous 90-day hazardous waste storage area but had not yet been updated to reflect the location of the interim storage location. The plan also detailed an evacuation plan but no copy was apparent in the plan under review. Mr. Erickson explained that the evacuation plan was posted around the facility. The contingency plan also listed the emergency response equipment available on site, but did not provide the location of the equipment or a brief description of its use.

Mr. Erickson stated that additional records were in the main office the North Building. After proceeding there, Mr. Erickson was able to provide more recent waste profiles for solvent-contaminated rags, waste paint material, waste thinner, paint booth filters, and waste oil. The latter two waste streams were confirmed non-hazardous. I asked Mr. Erickson about the waste determination on the chrome dip tank solution when the material was spent. He provided a SDS related to the active ingredient used to make the solution, but it did not provide potential chromium concentrations. He also provided a SDS for the Hydrite RCLT solvent mixture (See Attachment B: Select Safety Data Sheets). Mr. Erickson and I spoke briefly to Covanta Environmental Services over the phone, which picks up the chrome dip tank waste stream for treatment, to see if they had any information related to the waste profile. However, customer waste profile information was not readily available due to a recent ownership change. Mr.

Erickson said he would try and locate chrome dip tank waste stream information or obtain new information by sampling the material.

Personnel training records were unable to be located in the main office. Mr. Erickson stated that most of the training records were kept at QPC's Pickett facility. Although Mr. Erickson had retired within the past several weeks from QPC, he indicated it had likely been a few years since he provided hazardous waste management refresher training to QPC employees. He stated that he had provided it before. No records of QPC employees receiving hazardous waste management were able to be reviewed.

Closing Conference

I summarized my review of the site and potential issues to Mr. Erickson and Mr. Nelson. The issues and items that were discussed included:

- Universal waste lamp management and labeling requirements
- Labeling of hazardous waste satellite accumulation containers
- Hazardous waste management training requirements for employees and associated recordkeeping requirements
- The content required in a hazardous waste contingency plan
- The waste determination related to the chrome dip tank waste stream
- Maintaining a spill kit near the interim 90-day hazardous waste storage area

Mr. Nelson did not make any confidential business information claims during the inspection. The inspection ended at approximately 2:00 PM CST.

Inspection Follow-Up

On February 3, 2017, Mr. Knepfel provided a follow-up email regarding certain items identified during the inspection. Mr. Knepfel stated that Mr. Erickson had provided a refresher training session on hazardous waste management that same day and provided a scanned training roster. Mr. Knepfel also updated the new employee orientation checklist to ensure that all new hires are trained in hazardous waste management procedures. Mr. Knepfel stated that a total chromium analytical test was in progress for the chrome dip tank waste stream and that results would be provided when complete. An updated evacuation diagram was provided that indicated where emergency response equipment was located at QPC. Several photographs were provided displaying that universal waste lamps had been taken down from their storage area and properly containerized, a spill kit had been moved to the interim 90-day hazardous waste storage area, and a smudged hazardous waste label observed during the site tour had been replaced. This follow-up information is provided in Attachment C.

Attachments

A. Inspection Photographs
B. Select Safety Data Sheets
C. Inspection Follow-Up Documents
D. Inspection Checklists

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

RCRA Photo Log

Photo	Description	Time (CST)
1	Hazardous waste satellite accumulation area in the mix room in the North Building.	10:52 AM
2	The interim 90-day hazardous waste storage area in the South Building.	11:12 AM
3	Hazardous waste satellite accumulation area in a paint storage room in the South Building.	11:18 AM
4	Universal waste lamps stored above a paint booth in the North Building.	12:04 PM

Photo 1:

Photo 2:

Photo 3:

Photo 4:

ATTACHMENT B: Select Safety Data Sheets

Safety Data Sheet
acc. to OSHA HCS

Printing date 01/07/2015 Reviewed on 01/07/2015

1 Identification

· **Product identifier**

· **Trade name: SurTec 650**
· **Relevant identified uses of the substance or mixture and uses advised against**
No further relevant information available.

· **Details of the supplier of the safety data sheet**
· **Manufacturer/Supplier:**
SurTec, Inc.
3097 Interstate Parkway
Brunswick, OH 44212
USA
phone: +1-440-239-9710
fax: +1-330-220-2320
e-mail: surtecus@surtec.com
internet: www.surtec.com

· **Information department:** phone: +1-440-239-9710
· **Emergency telephone number:**
- Between the usual hours of business:
Monday - Friday
Between 8:00 - 12:00 o'clock
Between 13:00 - 17:00 o'clock

- For Chemical Emergency
Call ChemTrec
+1-800-424-9300

2 Hazard(s) identification

· **Classification of the substance or mixture**
The product is not classified according to the Globally Harmonized System (GHS).

· **Label elements**
· **GHS label elements** Void
· **Hazard pictograms** Void
· **Signal word** Void
· **Hazard statements** Void
· **Classification system:**
· **NFPA ratings (scale 0 - 4)**

Health = 0
Fire = 0
Reactivity = 0

· **HMIS-ratings (scale 0 - 4)**

Health = 0
Fire = 0
Reactivity = 0

· **Other hazards**
· **Results of PBT and vPvB assessment**
· **PBT:** Not applicable.
· **vPvB:** Not applicable.

3 Composition/information on ingredients

· **Chemical characterization: Mixtures**
· **Description:** Mixture of the substances listed below with nonhazardous additions.

(Contd. on page 2)

Safety Data Sheet
acc. to OSHA HCS

Printing date 01/07/2015 Reviewed on 01/07/2015

Trade name: SurTec 650

(Contd. of page 1)

· **Dangerous components:**

16923-95-8 dipotassium hexafluorozirconate <1%

4 First-aid measures

· **Description of first aid measures**
· **General information:**
Immediately remove any clothing soiled by the product.
No special measures required.
· **After inhalation:** Supply fresh air; consult doctor in case of complaints.
· **After skin contact:** Generally the product does not irritate the skin.
· **After eye contact:** Rinse opened eye for several minutes under running water.
· **After swallowing:**
Rinse out mouth and then drink plenty of water.
Do not induce vomiting; immediately call for medical help.
· **Most important symptoms and effects, both acute and delayed**
No further relevant information available.
· **Information for doctor:**
Treat according to symptoms (decontamination, vital functions), no known specific antidote.
· **Indication of any immediate medical attention and special treatment needed**
No further relevant information available.

5 Fire-fighting measures

· **Extinguishing media**
· **Suitable extinguishing agents:**
CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
· **Special hazards arising from the substance or mixture** Hydrogen fluoride (HF)
· **Advice for firefighters**
· **Protective equipment:**
Wear self-contained respiratory protective device.
Wear fully protective suit.
· **Additional information**
Collect contaminated fire fighting water separately. It must not enter the sewage system.
Dispose of fire debris and contaminated fire fighting water in accordance with official regulations.

6 Accidental release measures

· **Personal precautions, protective equipment and emergency procedures**
Wear protective equipment. Keep unprotected persons away.
· **Environmental precautions:**
Do not allow product to reach sewage system or any water course.
Inform respective authorities in case of seepage into water course or sewage system.
Do not allow to penetrate the ground/soil.
In case of seepage into the ground inform responsible authorities.
· **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
Dispose contaminated material as waste according to item 13.
For large amounts: Pump off product.
· **Reference to other sections**
See Section 7 for information on safe handling.
See Section 8 for information on personal protection equipment.

(Contd. on page 3)

Safety Data Sheet
acc. to OSHA HCS

Printing date 01/07/2015 Reviewed on 01/07/2015

Trade name: SurTec 650

(Contd. of page 2)

See Section 13 for disposal information.

7 Handling and storage

· **Precautions for safe handling** No special measures required.
· **Information about protection against explosions and fires:** No special measures required.

· **Conditions for safe storage, including any incompatibilities**
· **Storage:**
· **Requirements to be met by storerooms and receptacles:** Prevent any seepage into the ground.
· **Information about storage in one common storage facility:** Store away from foodstuffs.
· **Further information about storage conditions:**
The stability which is noticed on the label is only duty by right storage of the product.
· **Specific end use(s)** No further relevant information available.

8 Exposure controls/personal protection

· **Additional information about design of technical systems:** No further data; see item 7.

· **Control parameters**
· **Components with limit values that require monitoring at the workplace:**

16923-95-8 dipotassium hexafluorozirconate (<1%)

PEL Long-term value: 5 mg/m³
as Zr

REL Short-term value: 10 mg/m³
Long-term value: 5 mg/m³
as Zr

TLV Short-term value: 10 mg/m³
Long-term value: 5 mg/m³
as Zr

· **Additional information:** The lists that were valid during the creation were used as basis.

· **Exposure controls**
· **Personal protective equipment:**
· **General protective and hygienic measures:**
The usual precautionary measures for handling chemicals should be followed.
Wash hands before breaks and at the end of work.
Avoid contact with the eyes and skin.
Do not eat, drink, smoke or sniff while working.
· **Breathing equipment:** Not required.
· **Protection of hands:**
Rubber gloves or plastic gloves recommended during refilling.
To avoid skin problems reduce the wearing of gloves to the required minimum.
No chemical-protective gloves required.
· **Eye protection:** Goggles recommended during refilling.
· **Body protection:**
Body protection must be chosen depending on activity and possible exposure, e.g. apron, protecting boots, chemical-protection suit (according to DIN-EN 465).

9 Physical and chemical properties

· **Information on basic physical and chemical properties**
· **General Information**
· **Appearance:**

Form:	Fluid
Color:	Green

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Safety Data Sheet
acc. to OSHA HCS

Printing date 01/07/2015 Reviewed on 01/07/2015

Trade name: SurTec 650

(Contd. of page 3)

· **Odor:**	Nearly odorless
· **Odour threshold:**	Not determined.
· **pH-value at 20 °C (68 °F):**	3.8
· **Change in condition**	
Melting point/Melting range:	Undetermined.
Boiling point/Boiling range:	> 100 °C (> 212 °F)
· **Flash point:**	Not applicable.
· **Flammability (solid, gaseous):**	Not applicable.
· **Ignition temperature:**	
Decomposition temperature:	Not determined.
· **Auto igniting:**	Product is not selfigniting.
· **Danger of explosion:**	Product does not present an explosion hazard.
· **Explosion limits:**	
Lower:	Not determined.
Upper:	Not determined.
· **Vapor pressure at 20 °C (68 °F):**	23 hPa (17 mm Hg)
· **Density at 20 °C (68 °F):**	1.005 g/cm³ (8.387 lbs/gal)
· **Relative density**	Not determined.
· **Vapour density**	Not determined.
· **Evaporation rate**	Not determined.
· **Solubility in / Miscibility with**	
Water:	Not miscible or difficult to mix.
· **Partition coefficient (n-octanol/water):**	Not determined.
· **Viscosity:**	
Dynamic:	Not determined.
Kinematic:	Not determined.
· **Solvent content:**	
Organic solvents:	0.0 %
VOC content:	0.2 g/l / 0.00 lb/gl
· **Other information**	No further relevant information available.

10 Stability and reactivity

· **Reactivity**
· **Chemical stability**
· **Thermal decomposition / conditions to be avoided:**
No decomposition if used and stored according to specifications.
· **Possibility of hazardous reactions**
No dangerous reactions according to storage and handling regulations.
· **Conditions to avoid** No further relevant information available.
· **Incompatible materials:** No further relevant information available.
· **Hazardous decomposition products:**
None at correctly use.
Concerning decomposition products in the event of fire, see Chapter 5

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acc. to OSHA HCS

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Trade name: SurTec 650

(Contd. of page 4)

11 Toxicological information

· **Information on toxicological effects**
· **Acute toxicity:**
· **LD/LC50 values that are relevant for classification:**

16923-95-8 dipotassium hexafluorozirconate
Oral LD 50 98 mg/kg (mouse)
51-200 mg/kg (rat) (OECD 401)

· **Primary irritant effect:**
· **on the skin:** No irritant effect.
· **on the eye:** No irritating effect.
· **Additional toxicological information:**
The product is not subject to classification according to internally approved calculation methods for preparations:
When used and handled according to specifications, the product does not have any harmful effects according to our experience and the information provided to us.

· **Carcinogenic categories**
· **IARC (International Agency for Research on Cancer)**
14075-53-7 potassium tetrafluoroborate: 3
64-17-5 ethanol: 1
· **NTP (National Toxicology Program)**
None of the ingredients is listed.
· **OSHA-Ca (Occupational Safety & Health Administration)**
None of the ingredients is listed.

12 Ecological information

· **Toxicity**
· **Aquatic toxicity:**

16923-95-8 dipotassium hexafluorozirconate
LC 50 (48h) 50 mg/l (Daphnie) (OECD 202)
LC 50 (96h) > 200 mg/l (Leuciscus idus) (OECD 203)

· **Persistence and degradability** No further relevant information available.
· **Bioaccumulative potential** No further relevant information available.
· **Mobility in soil** No further relevant information available.
· **Additional ecological information:**
· **General notes:**
Water hazard class 1 (Self-assessment): slightly hazardous for water
Do not allow product to reach ground water, water course or sewage system.
· **Results of PBT and vPvB assessment**
· **PBT:** Not applicable.
· **vPvB:** Not applicable.
· **Other adverse effects** No further relevant information available.

13 Disposal considerations

· **Waste treatment methods**
· **Recommendation:**
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.
Must be specially treated adhering to official regulations.

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Trade name: SurTec 650

(Contd. of page 5)

· **Uncleaned packagings:**
· **Recommendation:**
Disposal must be made according to official regulations.
Empty contaminated packagings thoroughly. They can be recycled after thorough and proper cleaning.

14 Transport information

· **UN-Number**
· **DOT, ADR, IMDG, IATA** Void
· **UN proper shipping name**
· **DOT, ADR, IMDG, IATA** Void
· **Transport hazard class(es)**
· **DOT, ADR, IMDG, IATA**
· **Class** Void
· **Packing group**
· **DOT, ADR, IMDG, IATA** Void
· **Environmental hazards:**
· **Marine pollutant:** No
· **Special precautions for user** Not applicable.
· **Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code** Not applicable.
· **Transport/Additional information:** Not dangerous according to the above specifications.
· **UN "Model Regulation":** -

15 Regulatory information

· **Safety, health and environmental regulations/legislation specific for the substance or mixture**
· **Sara**
· **Section 355 (extremely hazardous substances):**
None of the ingredient is listed.
· **Section 313 (Specific toxic chemical listings):**
78-93-3 butanone
· **TSCA (Toxic Substances Control Act):**
All ingredients are listed.
· **Proposition 65**
· **Chemicals known to cause cancer:**
None of the ingredients is listed.
· **Chemicals known to cause reproductive toxicity for females:**
None of the ingredients is listed.
· **Chemicals known to cause reproductive toxicity for males:**
None of the ingredients is listed.
· **Chemicals known to cause developmental toxicity:**
64-17-5 ethanol
· **Carcinogenic categories**
· **EPA (Environmental Protection Agency)**
14075-53-7 potassium tetrafluoroborate: I (oral)
78-93-3 butanone: I
· **TLV (Threshold Limit Value established by ACGIH)**
16923-95-8 dipotassium hexafluorozirconate: A4
14075-53-7 potassium tetrafluoroborate: A4

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Trade name: SurTec 650

(Contd. of page 6)

64-17-5 ethanol: A3

· **NIOSH-Ca (National Institute for Occupational Safety and Health)**

None of the ingredients is listed.

· **GHS label elements** Void
· **Hazard pictograms** Void
· **Signal word** Void
· **Hazard statements** Void
· **Chemical safety assessment:** A Chemical Safety Assessment has not been carried out.

16 Other information

This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.

· **Department issuing SDS:** Product Safety Department
· **Contact:**
Mr. Carlos A. C. Chaves
+1-440-239-9710
· **Date of preparation / last revision** 01/07/2015 / -
· **Abbreviations and acronyms:**
ADR: Accord européen sur le transport des marchandises dangereuses par Route (European Agreement concerning the International Carriage of Dangerous Goods by Road)
IMDG: International Maritime Code for Dangerous Goods
DOT: US Department of Transportation
IATA: International Air Transport Association
ACGIH: American Conference of Governmental Industrial Hygienists
EINECS: European Inventory of Existing Commercial Chemical Substances
ELINCS: European List of Notified Chemical Substances
CAS: Chemical Abstracts Service (division of the American Chemical Society)
NFPA: National Fire Protection Association (USA)
HMIS: Hazardous Materials Identification System (USA)
VOC: Volatile Organic Compounds (USA, EU)
LC50: Lethal concentration, 50 percent
LD50: Lethal dose, 50 percent

SAFETY DATA SHEET

RC LT HIGH ACTIVES
Product ID: RC005601
Revised: 12-01-2014
Replaces: 08-22-2012

1. IDENTIFICATION

Product Name:	RC LT HIGH ACTIVES
Synonyms:	N.A.
CAS Number:	MIXTURE
Recommended Use:	No data available.
Restrictions on Use:	No data available.

Hydrite Chemical Co.
300 N. Patrick Blvd.
Brookfield, WI 53008-0948
(262) 792-1450

EMERGENCY RESPONSE NUMBERS:
24 Hour Emergency #: (414) 277-1311
CHEMTREC Emergency #: (800) 424-9300

2. HAZARD(S) IDENTIFICATION

Signal Word: Danger

GHS Classification:
Aspiration Hazard Category 1
Flammable Liquid Category 2
Skin Corrosion/Irritation Category 2
Serious Eye Damage/Eye Irritation Category 2A
Carcinogenicity Category 2
Specific Target Organ Systemic Toxicity (STOT) - Single Exposure Category 2
Specific Target Organ Systemic Toxicity (STOT) - Repeated Exposure Category 2

Hazard Statements:
Highly flammable liquid and vapour.
May be fatal if swallowed and enters airways.
Causes skin irritation.
Causes serious eye irritation.
Suspected of causing cancer.
May cause damage to organs (central nervous system by inhalation).
May cause damage to organs (central nervous system, liver, kidney, hearing, vision, reproductive system) through prolonged or repeated exposure (by ingestion).

Precautionary Statements:

Prevention:
Obtain special instructions before use.
Do not handle until all safety precautions have been read and understood.
Keep away from heat, sparks, open flames and hot surfaces. – No smoking.
Keep container tightly closed.
Ground and bond container and receiving equipment.
Use explosion-proof electrical, ventilating, and lighting equipment.
Use only non-sparking tools.
Take precautionary measures against static discharge.
Do not breathe dust/fume/gas/mist/vapours/spray.

Wash thoroughly after handling.
Do not eat, drink or smoke when using this product.
Wear protective gloves/protective clothing/eye protection/face protection.

Response: IF SWALLOWED: Immediately call a POISON CENTER or doctor.
IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
IF exposed or concerned: Get medical advice or attention.
IF exposed or if you feel unwell: Call a POISON CENTER or doctor.
Specific treatment (see First Aid on SDS or on this label).
Do NOT induce vomiting.
If skin irritation occurs: Get medical advice or attention.
If eye irritation persists: Get medical advice or attention.
Take off contaminated clothing and wash before reuse.
In case of fire: Use Dry chemical., Carbon dioxide., Water spray., Alcohol foam. to extinguish.

Storage: Keep container tightly closed.
Store in a well-ventilated place. Keep cool.
Store in a secure manner.

Disposal: Dispose of in accordance with local, regional and international regulations.

Hazards Not Otherwise Classified: May be harmful or fatal if swallowed and enters airways. Potential peroxide former. May cause damage to the following organs: blood, kidneys, lungs, liver, mucous membranes, heart, upper respiratory tract, skin, auditory system, central nervous system, eye, lens or cornea. Breathing high concentrations can cause irregular heartbeats which may be fatal.

Percentage of Components with Unknown Acute Toxicity:
Oral: 41.9 %
Dermal: 46 %

3. COMPOSITION/INFORMATION ON INGREDIENTS

Component	CAS Number	% by Wt.
Methyl Ethyl Ketone	78-93-3	< 75 %
Methyl Isobutyl Ketone	108-10-1	< 35 %
Acetone	67-64-1	< 25 %
Toluene	108-88-3	< 25 %
Xylene (Mixed Isomers)	1330-20-7	< 15 %
1-Butanol	71-36-3	< 10 %
N-Propyl Acetate	109-60-4	< 10 %
Ethylbenzene	100-41-4	< 8 %
N-Butyl Acetate	123-86-4	< 8 %
Propylene Glycol Monomethyl Ether Acetate	108-65-6	< 8 %
1-Methoxy-2-Propanol	107-98-2	< 8 %
Tert-Butyl Acetate	540-88-5	< 5 %
Isopropyl Alcohol	67-63-0	< 5 %
Methyl Amyl Ketone	110-43-0	< 5 %
N-Heptane	142-82-5	< 5 %
Ethyl Alcohol	64-17-5	< 5 %

4. FIRST-AID MEASURES

Eye Contact: If in eyes: Immediately flush eyes with plenty of water for at least 15 minutes while holding eyelids open. Tilt head to avoid contaminating unaffected eye. Get immediate medical attention. Remove contact lens if easy to do. Do not use eye ointment unless under the advice of a physician.

Skin Contact: If on skin: Immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately. Do not reuse clothing and shoes until cleaned. Wash with soap and water. Do not apply oils or ointments unless ordered by the physician. Discard contaminated leather articles such as shoes and belt. Discard footwear which cannot be decontaminated.

Inhalation: If inhaled: Remove to fresh air. If breathing is difficult, administer oxygen. If not breathing, give artificial respiration, preferably mouth-to-mouth. GET MEDICAL ATTENTION IMMEDIATELY. Keep warm and quiet.

Ingestion: If swallowed: Call a physician immediately. DO NOT induce vomiting unless directed to do so by a physician. Never give anything by mouth to an unconscious person. If vomiting occurs spontaneously, keep head below hips to prevent aspiration of liquid into the lungs. If victim is drowsy or unconscious, place on the left side with head down. Do not leave victim unattended.

Note to Physicians:
If ingested, material may be aspirated into the lungs and cause chemical pneumonitis. Treat appropriately. Inhalation overexposure can produce toxic effects. Monitor for respiratory distress. If cough or difficulty in breathing develops, evaluate for upper respiratory tract inflammation, bronchitis, and pneumonitis. Administer supplemental oxygen with assisted ventilation, as required. This material (or a component) sensitizes the heart to the effects of sympathomimetic amines. Epinephrine and other sympathomimetic drugs may initiate cardiac arrhythmias in individuals exposed to this material. Administration of sympathomimetic drugs should be avoided. If ingested, this material presents a significant aspiration and chemical pneumonitis hazard. Induction of emesis is not recommended. Consider activated charcoal and/or gastric lavage. If patient is obtunded, protect the airway by cuffed endotracheal intubation or by placement of the body in a Trendelenburg and left lateral decubitus position. Symptoms may be delayed.

Most Important Symptoms/Effects:

Eye Contact: Causes severe irritation. May cause: burning sensation. pain. tearing. change of vision. redness. stinging. swelling. burning. blurred vision. corneal inflammation. corneal damage. light sensitivity. Vapors may cause: irritation.

Skin Contact: Causes moderate irritation. Contact may cause: redness. burning. itching. cracking. Prolonged contact may cause: severe irritation. sensitization. cyanosis of the extremities. tissue destruction.

Skin Absorption: May be harmful if absorbed through skin. May be absorbed through the skin and cause effects similar to inhalation or ingestion. Absorption may cause: systemic effects.

Inhalation: May cause moderate to severe irritation. Vapors may irritate: nose. throat. respiratory tract. May cause: headache. dizziness. anesthesia. nasal discomfort and discharge. hoarseness. coughing. chest pain. difficulty breathing. nausea. drowsiness. stupor. incoordination. unconsciousness. weakness. fatigue. vomiting. lightheadedness. delirium. Prolonged or repeated contact may cause: kidney and liver damage. Breathing high concentrations of this material, for example, in an enclosed space or by intentional abuse, can cause irregular heartbeats which can cause death. Breathing air which contains butyl acetate, resulting from its use in aerosol applications, may cause delayed lung damage. Excessive exposure may cause: hypotension. hypothermia. circulatory failure. death.

Ingestion: May cause mild to severe irritation. Small amounts of liquid aspirated into the lungs during ingestion or from vomiting may cause chemical pneumonitis or pulmonary edema. May cause: gastrointestinal irritation. nausea. vomiting. diarrhea. central nervous system depression. dizziness. headache. stupor. incoordination. loss of appetite. unconsciousness. May cause damage to the: kidneys. liver. May cause irritation of the: mouth. throat. stomach. Large amounts may cause: collapse. coma. possible death due to respiratory failure.

5. FIRE-FIGHTING MEASURES

Extinguishing Media: Water spray. Dry chemical. Carbon dioxide. Alcohol foam. Do not use straight streams of water. Water may be ineffective but should be used to cool fire-exposed structures and vessels.

Fire Fighting Methods: Evacuate area of unprotected personnel. Wear protective clothing including NIOSH-approved self-contained breathing apparatus. Remain upwind of fire to avoid hazardous vapors and decomposition products. Use water spray to cool fire-exposed containers and disperse vapors. If container is not properly cooled, it can rupture in the heat of a fire. Use water spray to cool fire exposed surfaces and to protect personnel. Do not use direct water stream. May spread fire. This liquid is volatile and gives off invisible vapors. Keep out of low areas where gases (fumes) can accumulate. Run-off from fire control may cause pollution.

Fire and Explosion Hazards: HIGHLY FLAMMABLE LIQUID. Vapors are heavier than air. Vapors may settle in low or confined areas, or travel long distances along the ground or surface to an ignition source where they may ignite, flashback, or explode. Keep away from heat, sparks, flames or other sources of ignition (e.g., static electricity, pilot lights, mechanical/electrical equipment). PROCESS HAZARD: Sudden release of hot organic chemical vapors or mists from process equipment operating at elevated temperature and pressure, or sudden ingress of air into hot equipment under a vacuum, may result in ignitions without the presence of obvious ignition sources. Published "autoignition" or "ignition" temperature values cannot be treated as safe operating temperatures in chemical processes without analysis of the actual process conditions. Any use of this product in elevated-temperature processes should be thoroughly evaluated to establish and maintain safe operating conditions. Forms explosive peroxides which may be shock sensitive. This material may produce a floating fire hazard. This material releases vapors at or below ambient temperatures. Prevent buildup of vapors or gases to explosive concentrations. Flame may be invisible. Approach fire with caution. Material may accumulate a static charge which could act as an ignition source.

Hazardous Combustion Products: Carbon dioxide. Carbon monoxide. Unidentifiable organic materials. Smoke. Fumes. Aldehydes. Unburned hydrocarbons. Products of incomplete combustion. No data available.

6. ACCIDENTAL RELEASE MEASURES

Spill Clean-Up Procedures: HIGHLY FLAMMABLE LIQUID. Eliminate all sources of ignition. Evacuate unprotected personnel from area. Maintain adequate ventilation. Follow personal protective equipment recommendations found in Section 8. Never exceed any occupational exposure limit. Shut off source of leak if safe to do so. Contain spill, place into drums for proper disposal. Soak up residue with non-flammable absorbent material. DO NOT use sawdust or other cellulose-type material. Place in non-leaking containers for immediate disposal. Flush remaining area with water to remove trace residue and dispose of properly. Avoid direct discharge to sewers and surface waters. Notify authorities if entry occurs. Prevent entry into basements, low areas, or confined areas. Use non-sparking tools and equipment. CAUTION: Spilled material may be slippery.

7. HANDLING AND STORAGE

Handling: Avoid contact with eyes, skin, and clothing. Use with adequate ventilation. Do not swallow. Avoid breathing vapors, mists, or dust. Do not eat, drink, or smoke in work area. Wash thoroughly after handling. Empty containers retain product residue (vapor, dust, or liquid) and can be dangerous. DO NOT pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other source of ignition. They may explode and cause injury or death. Always open containers slowly to allow any excess pressure to vent. Launder contaminated clothing before reuse. Air-dry contaminated clothing in a well ventilated area before laundering. Use non-sparking tools and equipment. Use appropriate grounding and bonding practices. Take precautionary measures against static discharges. A static electrical charge can accumulate when this material is flowing through pipes, nozzles or filters and when it is agitated. Do not fill any portable container in or on a vehicle. DO NOT use compressed air for filling, discharing or other handling operations. Always keep nozzle in contact with the container throughout the loading process. Bond and ground transfer containers and equipment.

Storage: HIGHLY FLAMMABLE LIQUID. Store in a cool, well-ventilated area away from all sources of ignition and out of direct sunlight. Store in a dry location away from heat. Keep away from incompatible materials. Keep containers tightly closed. Do not store in unlabeled or mislabeled containers. Static electricity may accumulate and create a fire hazard. Ground fixed equipment. Bond and ground transfer containers and equipment. Store away from light. Minimize exposure to air. Periodically test for peroxide formation on long-term storage. If

peroxide formation is suspected, do not open or move container. Avoid contamination of food or feed. Protect containers against physical damage. Refer to local fire codes for storage requirements and allowable limits. See Section 10 for incompatible materials.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

OSHA Exposure Guidelines:

Component	Limits
Methyl Ethyl Ketone	200 ppm TWA; 590 mg/m3 TWA
Methyl Isobutyl Ketone	100 ppm TWA; 410 mg/m3 TWA
Acetone	1000 ppm TWA; 2400 mg/m3 TWA
Toluene	300 ppm Ceiling; 200 ppm TWA
Xylene (Mixed Isomers)	100 ppm TWA; 435 mg/m3 TWA
1-Butanol	100 ppm TWA; 300 mg/m3 TWA
N-Propyl Acetate	200 ppm TWA; 840 mg/m3 TWA
Ethylbenzene	100 ppm TWA; 435 mg/m3 TWA
N-Butyl Acetate	150 ppm TWA; 710 mg/m3 TWA
Tert-Butyl Acetate	200 ppm TWA; 950 mg/m3 TWA
Isopropyl Alcohol	400 ppm TWA; 980 mg/m3 TWA
Methyl Amyl Ketone	100 ppm TWA; 465 mg/m3 TWA
N-Heptane	500 ppm TWA; 2000 mg/m3 TWA
Ethyl Alcohol	1000 ppm TWA; 1900 mg/m3 TWA

ACGIH Exposure Guidelines:

Component	Limits
Methyl Ethyl Ketone	200 ppm TWA; 300 ppm STEL
Methyl Isobutyl Ketone	20 ppm TWA; 75 ppm STEL
Acetone	500 ppm TWA; 750 ppm STEL
Toluene	20 ppm TWA
Xylene (Mixed Isomers)	100 ppm TWA; 150 ppm STEL
1-Butanol	20 ppm TWA
N-Propyl Acetate	200 ppm TWA; 250 ppm STEL
Ethylbenzene	20 ppm TWA
N-Butyl Acetate	150 ppm TWA; 200 ppm STEL
1-Methoxy-2-Propanol	50 ppm TWA; 100 ppm STEL
Tert-Butyl Acetate	200 ppm TWA
Isopropyl Alcohol	200 ppm TWA; 400 ppm STEL
Methyl Amyl Ketone	50 ppm TWA
N-Heptane	400 ppm TWA (listed under Heptane, all isomers); 500 ppm STEL (listed under Heptane, all isomers)
Ethyl Alcohol	1000 ppm STEL

Engineering Controls: Local exhaust ventilation, process enclosures, or other engineering controls are imperative when handling or using this product to avoid overexposure. Use explosion-proof ventilation equipment. Maintain adequate ventilation. Do not use in closed or confined spaces. Avoid creating dust or mist. Keep levels below exposure limits. To determine exposure levels, monitoring should be performed regularly.

Eye/Face Protection: Wear chemical safety goggles and a full face shield while handling this product. Do not wear contact lenses. Wear a full-face respirator, if needed.

Skin Protection: Prevent contact with this product. Wear gloves and protective clothing depending on condition of use. Protective gloves: Chemical-resistant. Butyl rubber. Impervious.

Respiratory Protection: Respiratory protection must be worn if ventilation does not eliminate symptoms or keep levels below recommended exposure limits. If exposure limits are exceeded, wear: NIOSH-Approved organic respirator. NIOSH-Approved air purifying respirator. NIOSH-Approved Supplied Air Respirator (SAR). NIOSH-Approved self-contained breathing apparatus. DO NOT exceed limits established by the respirator manufacturer.

All respiratory protection programs must comply with OSHA 29 CFR 1910.134 and ANSI Z88.2 requirements and must be followed whenever workplace conditions require a respirator's use.

Other Protective Equipment: Eye-wash station. Safety shower. Rubber apron. Chemical safety shoes. Rubber boots. Protective clothing.

General Hygiene Conditions: Food, beverages, and tobacco products should not be carried, stored or consumed where this material is in use. Wash with soap and water before meal times and at the end of each work shift. Good manufacturing practices require gross amounts of any chemical be removed from skin as soon as practical, especially before eating or smoking. Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical State: Liquid.
Color: Clear. Colorless to yellow.
Odor: Typical hydrocarbon odor.
Odor Threshold: N.D.
pH: N.A.
Freezing Point (deg. F): N.D.
Melting Point (deg. F): N.D.
Initial Boiling Point or Boiling Range: 150 °F N.D.
Flash Point: < 40 °F
Flash Point Method: Estimated.
Evaporation Rate (nBuAc = 1): N.D.
Flammability (solid, gas): N.D.
Lower Explosion Limit: N.D.
Upper Explosion Limit: N.D.
Vapor Pressure (mm Hg): N.D.
Vapor Density (air=1): N.D.
Specific Gravity or Relative Density: 0.81 - 0.83 @ 25 Deg. C
Solubility in Water: N.D.
Partition Coefficient (n-octanol/water): N.D.
Autoignition Temperature: No Data
Decomposition Temperature: N.D.
Viscosity: N.D.
% Volatile (wt%): 100 %
VOC (wt%): ~ 90 %
VOC (lbs/gal): ~ 6.08 - 6.22
Fire Point: N.D.

10. STABILITY AND REACTIVITY

Reactivity: No data available.

Chemical Stability: Stable under recommended storage conditions.

Possibility of Hazardous Reactions: Hazardous polymerization will not occur under normal conditions. Product can oxidize at elevated temperatures. Under normal storage conditions peroxides may accumulate and explode when subjected to heat or shock. Distillation or evaporation increases peroxide formation and increases the explosion hazard.

Conditions to Avoid: Avoid contact with heat, sparks, electric arcs, other hot surfaces, and open flames. Avoid other ignition sources. Forms explosive peroxides which may be shock sensitive. Avoid contact with air. Do not distill to near dryness. Avoid static discharges.

Incompatible Materials: Strong oxidizing agents. Acids. Halogenated compounds. Caustics. Ammonia. Amines. Isocyanates. Pyridines. Alkalies. Bases. Copper or copper alloys. Halogens or halogen compounds. Strong reducing agents. Potassium tert-butoxide. Chromium trioxide. Aliphatic amines. Bromine. Bromine trifluoride.

Bromoform. Chloroform. Chromyl chloride. Dioxygen difluoride with solid carbon dioxide. Hexachloromelamine. Hydrogen peroxide. Nitric compounds. Plastics. Platinum with nitrosyl chloride. Rayon. Sodium hypobromite. Sodium hypoiodite. Sulfur dichloride. Thiotriazole perchlorate. 1,1,1-Trichloroethane. Trichloromelamine. Activated carbon. Strong acids. Oxidizing agents. Liquid chlorine. Oxygen. Strong alkalies. Molten sulfur. Strong mineral acids. Halogens. Aluminum. Alkali metals. Nitric acid. Sodium hydroxide. Perchloric Acid. Alkali metal hydroxides. Chlorosulfonic acid. Alumina. Peroxides. Polymerization initiators. Nitrates. Silica gel.

Hazardous Decomposition Products: Carbon oxides. Carbon dioxide. Carbon monoxide. Unidentifiable organic materials. Aldehydes. Hydrocarbons. Unidentifiable organic materials. Irritating and/or toxic gases. Smoke. Fumes. Unburned hydrocarbons. Combustion products:

11. TOXICOLOGICAL INFORMATION

Component	Oral LD50	Dermal LD50	Inhalation LC50
Methyl Ethyl Ketone	No Data	No Data	8H Rat: 23500 mg/m3
Methyl Isobutyl Ketone	Rat: 2080 mg/kg	Rabbit: > 16000 mg/kg	4H Rat: 8.2 mg/L
Acetone	No Data	No Data	8H Rat: 50100 mg/m3
Toluene	Rat: 636 mg/kg	Rabbit: 8390 mg/kg	4H Rat: 12.5 mg/L
Xylene (Mixed Isomers)	Rat: 4300 mg/kg	No Data	4H Rat: 47635 mg/L
1-Butanol	Rat: 790 mg/kg	Rabbit: 3400 mg/kg	4H Rat: 8000 ppm
N-Propyl Acetate	Rat: 9370 mg/kg	Rabbit: > 20 ml/kg	No Data
Ethylbenzene	Rat: 3500 mg/kg	Rabbit: 15354 mg/kg	4H Rat: 17.2 mg/L
N-Butyl Acetate	No Data	Rabbit: > 17600 mg/kg	4H Rat: 390 ppm
Propylene Glycol Monomethyl Ether Acetate	Rat: 8532 mg/kg	Rabbit: > 5 g/kg	No Data
1-Methoxy-2-Propanol	Rat: 5200 mg/kg	Rabbit: 13 g/kg	4H Rat: 54.6 mg/L
Tert-Butyl Acetate	No Data	No Data	4H Rat: > 2230 mg/m3
Isopropyl Alcohol	Rat: 4396 mg/kg	Rabbit: 12800 mg/kg	8H Rat: 16000 ppm
Methyl Amyl Ketone	Rat: 1600 mg/kg	Rabbit: 13 ml/kg	4H Rat: > 2000 ppm
N-Heptane	Mouse: 5000 mg/kg	Rabbit: 3000 mg/kg	4H Rat: 103 g/m3
Ethyl Alcohol	No Data	No Data	4H Rat: 124.7 mg/L

Acute Toxicity Estimate (ATE):

Oral:	2462 mg/kg
Inhalation Vapor:	29.605 mg/L
Inhalation Dust/Mist:	203.3717 mg/L

Routes of Exposure: Eyes. Ingestion. Inhalation. Skin. Absorption.

Eye Contact: Causes severe irritation. May cause: burning sensation. pain. tearing. change of vision. redness. stinging. swelling. burning. blurred vision. corneal inflammation. corneal damage. light sensitivity. Vapors may cause: irritation.

Skin Contact: Causes moderate irritation. Contact may cause: redness. burning. itching. cracking. Prolonged contact may cause: severe irritation. sensitization. cyanosis of the extremities. tissue destruction.

Skin Absorption: May be harmful if absorbed through skin. May be absorbed through the skin and cause effects similar to inhalation or ingestion. Absorption may cause: systemic effects.

Inhalation: May cause moderate to severe irritation. Vapors may irritate: nose. throat. respiratory tract. May cause: headache. dizziness. anesthesia. nasal discomfort and discharge. hoarseness. coughing. chest pain. difficulty breathing. nausea. drowsiness. stupor. incoordination. unconsciousness. weakness. fatigue. vomiting. lightheadedness. delirium. Prolonged or repeated contact may cause: kidney and liver damage. Breathing high concentrations of this material, for example, in an enclosed space or by intentional abuse, can cause irregular heartbeats which can cause death. Breathing air which contains butyl acetate, resulting from its use in aerosol applications, may cause delayed lung damage. Excessive exposure may cause: hypotension. hypothermia. circulatory failure. death.

Ingestion: May cause mild to severe irritation. Small amounts of liquid aspirated into the lungs during ingestion or from vomiting may cause chemical pneumonitis or pulmonary edema. May cause: gastrointestinal irritation. nausea. vomiting. diarrhea. central nervous system depression. dizziness. headache. stupor. incoordination. loss of appetite. unconsciousness. May cause damage to the: kidneys. liver. May cause irritation of the: mouth. throat. stomach. Large amounts may cause: collapse. coma. possible death due to respiratory failure.

Medical Conditions Aggravated by Exposure to Product: Central nervous system disorders. Eye disorders. Skin disorders. Respiratory system disorders. Digestive tract disorders. Kidney disorders. Liver disorders. Heart disorders. Auditory System Disorders. Impaired respiratory function. Persons also exposed to acetic acid or propanol might be more sensitive, as these are metabolites of propyl acetate. No data available. Impaired pulmonary function. Dermatitis. Asthma. Inflammatory or fibrotic pulmonary disease.

Other: Simultaneous exposure to Methyl Ethyl Ketone (MEK) and n-Hexane can potentiate the risk of adverse effects from n-Hexane on the peripheral nervous system. Prolonged exposure to high concentrations can cause central neurological depression and EEG abnormalities. Drinking alcohol may worsen the effects resulting from exposure to this product. Acetone may increase the toxicity to the liver and kidney of chemicals such as ethanol, 1,2-dichloroethylene, and chloroform. Humans with liver or kidney disease may be at increased risk due to this potentiation effect. Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage (sometimes referred to as Solvent or Painters' Syndrome). Intentional misuse by deliberately concentrating and inhaling this material may be harmful or fatal. This material (or a component) may cause harm to the human fetus based on tests with laboratory animals. Long-term overexposure to toluene has been associated with impaired color vision. Long-term overexposures to toluene in occupational environments have been associated with hearing damage. Butanol vapor can cause specific injury to the cornea. May affect sense of balance with chronic exposure.

Cancer Information:
This product contains 0.1% or more of the following chemicals listed by NTP, IARC or OSHA as known or possible carcinogens:
Methyl isobutyl ketone
ethylbenzene

12. ECOLOGICAL INFORMATION

Ecotoxicological Information: No data available.

Chemical Fate Information: No data available.

13. DISPOSAL CONSIDERATIONS

Hazardous Waste Number: D001

Note: When methyl ethyl ketone is a spent solvent, it is classified as a hazardous waste from a nonspecific source (F005), as stated in 40 CFR 261.31. When methyl isobutyl ketone is a spent solvent, it is classified as a hazardous waste from a nonspecific source (F003), as stated in 40 CFR 261.31. When acetone is a spent solvent, it is classified as a hazardous waste from a nonspecific source (F003), as stated in 40 CFR 261.31. An additional EPA Hazardous Waste Number may include: D018. When toluene is a spent solvent, it is classified as a hazardous waste from a nonspecific source (F005), as stated in 40 CFR 261.31. When xylene and ethyl benzene are a spent solvent, they are classified as a hazardous waste from a nonspecific source (F003), as stated in 40 CFR 261.31. When n-Butyl alcohol is a spent solvent, it is classified as a hazardous waste from a nonspecific source (F003), as stated in 40 CFR 261.31.

Disposal Method: Dispose of in a permitted hazardous waste management facility following all local, state and federal regulations. Reclaim (recycle) solvent. Since emptied containers retain product residue, follow label warnings even after container is emptied. DO NOT pressurize, cut, weld, solder, drill, grind or expose empty containers to heat, flame, sparks or other sources of ignition. Disposal methods identified are for the product as sold. For proper disposal of used material, an assessment must be completed to determine the proper and permissible waste management options permitted under applicable rules, regulations and/or laws governing your location.

14. TRANSPORT INFORMATION

DOT (Department of Transportation):

Identification Number:	UN1263
Proper Shipping Name:	PAINT RELATED MATERIAL
Hazard Class:	3
Packing Group:	II
Label Required:	FLAMMABLE
Reportable Quantity (RQ):	5000# (Methyl Ethyl Ketone); 5000# (Methyl Isobutyl Ketone); 5000# (Acetone); 1000# (Toluene); 100# (Xylene-mixed isomers); 5000# (n-Butyl Alcohol); 1000# (Ethyl Benzene); 5000# (Butyl Acetate); 5000# (tert-Butyl Acetate).

15. REGULATORY INFORMATION

TSCA Inventory Status: All components of this product are on the TSCA Inventory or are exempt from TSCA Inventory requirements.

SARA Title III Section 311/312 Category Hazards:

Immediate (Acute)	Delayed (Chronic)	Fire Hazard	Pressure Release	Reactive
Yes	Yes	Yes	No	No

Regulated Components: Component	CAS Number	CERCLA RQ	SARA EHS	SARA 313	U.S. HAP	WI HAP	Prop 65
Methyl Ethyl Ketone	78-93-3	Yes	No	No	No	No	No
Methyl Isobutyl Ketone	108-10-1	Yes	No	Yes	Yes	Yes	Yes
Acetone	67-64-1	Yes	No	No	No	No	No
Toluene	108-88-3	Yes	No	Yes	Yes	Yes	Yes
Xylene (Mixed Isomers)	1330-20-7	Yes	No	Yes	Yes	Yes	No
1-Butanol	71-36-3	Yes	No	Yes	No	Yes	No
Ethylbenzene	100-41-4	Yes	No	Yes	Yes	Yes	Yes
N-Butyl Acetate	123-86-4	Yes	No	No	No	No	No
1-Methoxy-2-Propanol	107-98-2	No	No	No	No	Yes	No
Tert-Butyl Acetate	540-88-5	Yes	No	No	No	No	No
Isopropyl Alcohol	67-63-0	No	No	No	No	No	No
Methyl Amyl Ketone	110-43-0	No	No	No	No	Yes	No
Ethyl Alcohol	64-17-5	No	No	No	No	No	Yes*

***Prop 65 - May Contain the Following Trace Components:**
Benzene
Cumene
Naphthalene

Note: *Ethyl alcohol in alcoholic beverages is listed.

Clean Water Act:
This material may be classified as an oil under Section 311 of the Clean Water Act (CWA) and the Oil Pollution Act of 1990 (OPA). Discharge or spills which produce a visible sheen on waters of the United States, their adjoining shorelines, or into conduits leading to surface waters must be reported to the EPA's National Response Center at (800)424-8802.

16. OTHER INFORMATION

Hazard Rating System
Health: 2*

Flammability: 3
Reactivity: 1
* = Chronic Health Hazard

NFPA Rating System
Health: 2
Flammability: 3
Reactivity: 1
Special Hazard: None

SDS Abbreviations
N.A. = Not Applicable
N.D. = Not Determined
HAP = Hazardous Air Pollutant
VOC = Volatile Organic Compound
C = Ceiling Limit
N.E./Not Estab. = Not Established

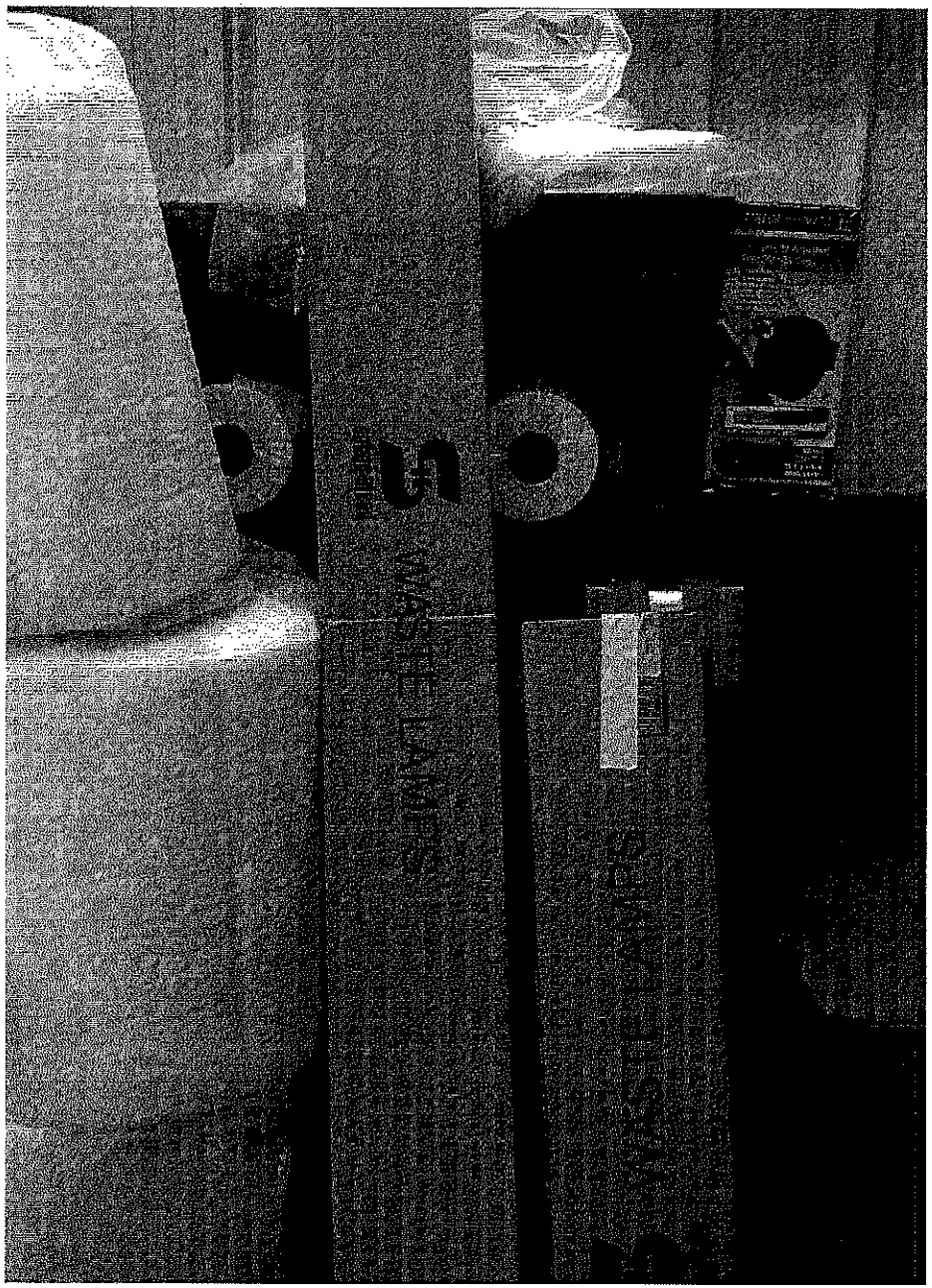
SDS Prepared by: JAK

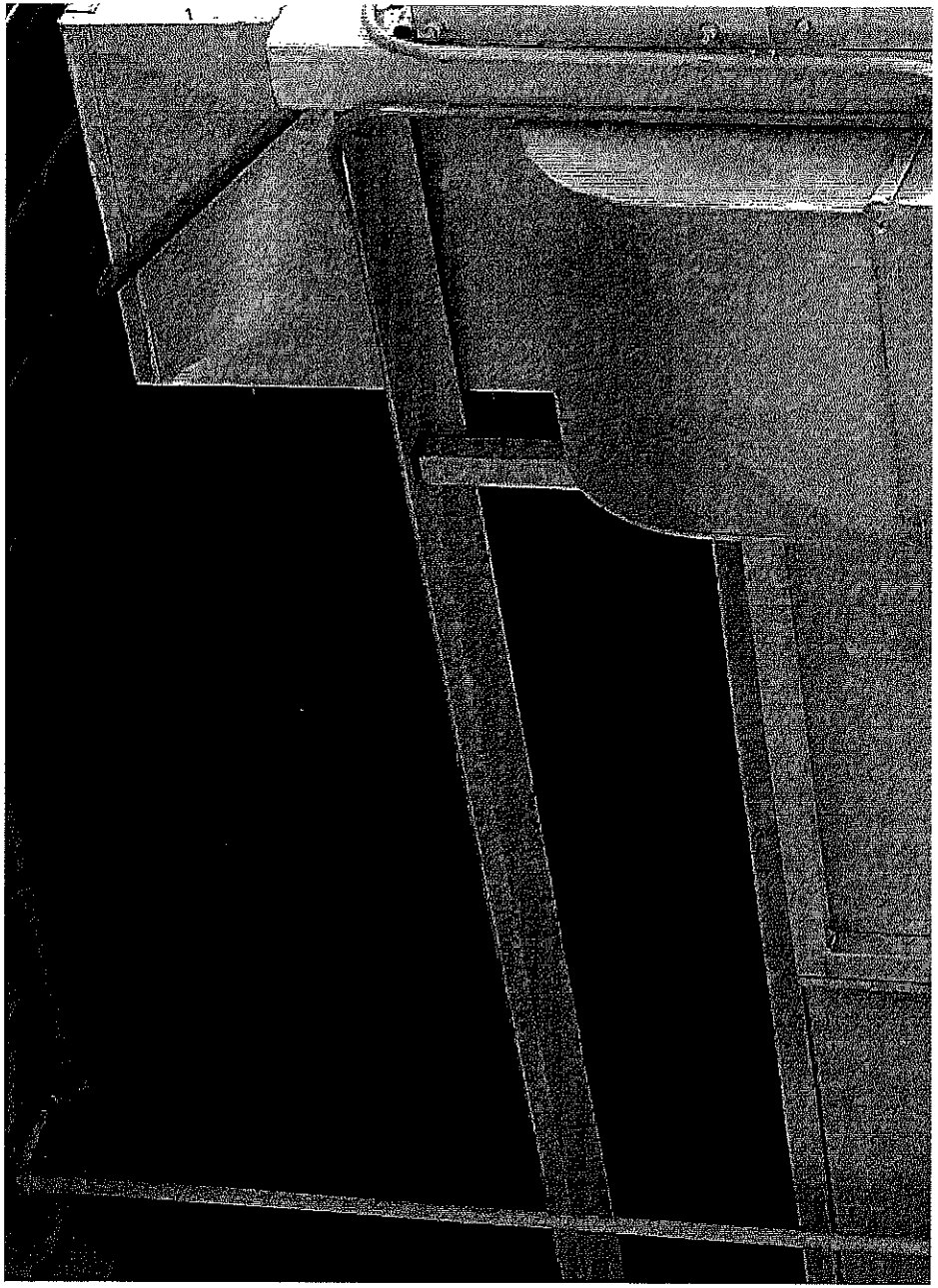
Reason for Revision: New format. Changes made throughout the SDS.

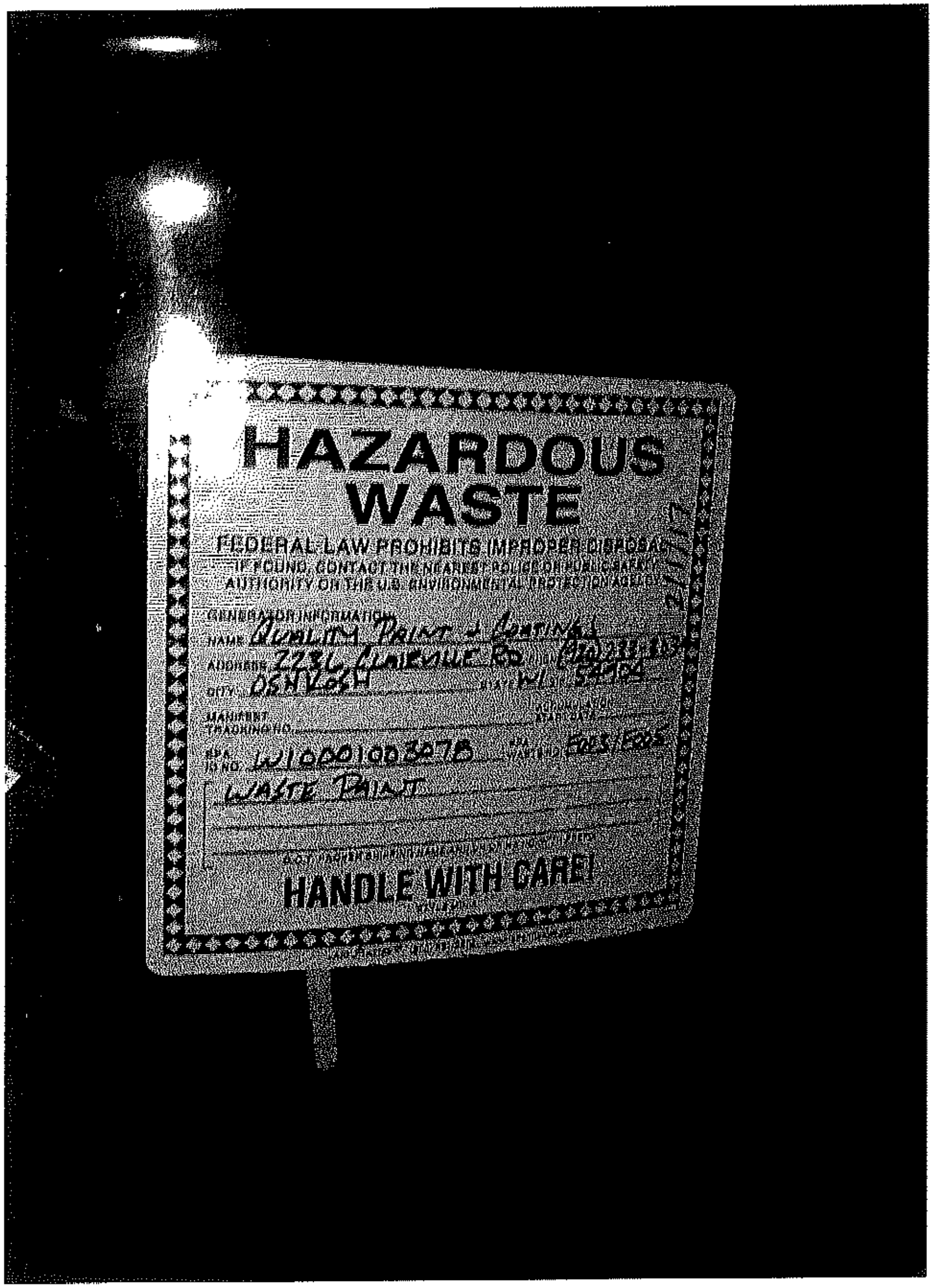
Revised: 12-01-2014
Replaces: 08-22-2012

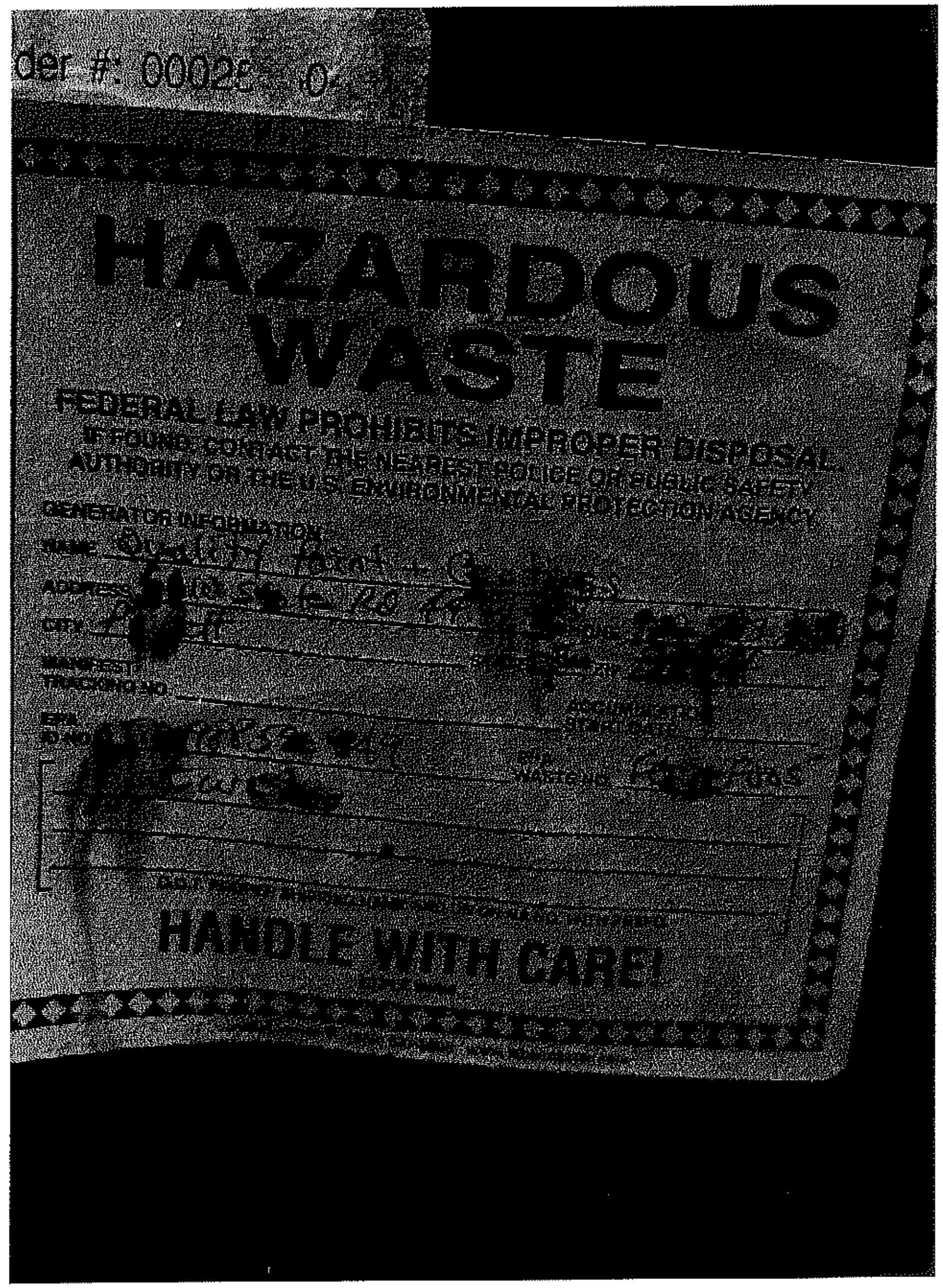
ATTACHMENT C: Inspection Follow-Up Documents

CAU
Repair Putty
New Pig






HAZARDOUS
WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
GENERATOR INFORMATION
NAME
ADDRESS
CITY
MANIFEST TRACKING NO.
EPA ID NO.
HANDLE WITH CARE!


der #: 0002
HAZARDOUS
WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR INFORMATION
NAME
ADDRESS
CITY
MANIFEST TRACKING NO.
EPA ID NO.
EPA WASTE NO.
HANDLE WITH CARE!

Quality Paint and Coatings
6610 State Road 44
P.O. Box 279
Pickett, WI 54964
Call 920.233.3039
Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Adam Barwell	Adam Barwell
Amy Volkman	Amy Volkman
Andrew Turner	Andrew Turner
Anthony Ochowicz	Anthony Ochowicz
Arnie Bradshaw	Arnie Bradshaw
Brad Kroll	Brad Kroll
Bradon Koepke	Bradon Koepke
Brian Diener	Brian Diener
Brock Stellmacher	Brock Stellmacher
Calvin Tollard	Calvin Tollard
Chuck Nelson	Chuck Nelson

Instructor Signature: Robert Erickson Date: 2/3/17

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Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Carl Strege	Carl Strege
Chris Jordan	ABSENT
Chris Pinno	
Clarence Curtis	Clarence Curtis
Cole Craig	Cole Craig
Dave Knepfel	
Dave Decker	
Dave Hurd	Dave Hurd
Dave Krueger	Dave Krueger
Doug Werner	Doug Werner

Instructor Signature: Robert Linkner Date: 2/3/17

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Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Dylan Drake	Dylan Drake
Dylan Hyler	DH
Manny Nelson	PH ABSENT
Eric Dixon	Eric Dixon
~~Gary Etchinger~~	NO LONGER EMPLOYED
Gregg Gumness	Gregg Gumness
Greg Banks	Greg Banks
Gus Molitor	
Gus Guzzo	Gustav Guzzo
Henry Williams	Henry Williams Henry

Instructor Signature: Robert Fischer Date: 2/3/17

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Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Isiah Gumness	PIT ABSENT
James Busby	
James Curtis	
JJ Stelter	
Jamie Braasch	
Jarmen Walter	
Jason Bretzel	
Jennifer Ostrowski	
Jeremy Egner	
Jerimiah Spencer	

Instructor Signature: Robert Fischer Date: 2/3/17

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Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Jesse Robinson	ABSENT
John Flugaur	
Jon Polakowski	ABSENT
Joe Lassiter	ABSENT
Joe Luchsinger	ABSENT
Joe Schettle	Joseph Schettle
Josh Aaron	
Josh Binder	
Josiah Gumness	P/T ABSENT
Julia Erdman	

Instructor Signature: Robert Erickson Date: 2/3/17

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Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Justin Charnas	
Keith Dabbs	ABSENT
Kevin Peterson	
Kory Drake	
Kyle Burns	
Kylie Beck	PIT - ABSENT
Lance Stadler	
Larry Klatt	
Lugene Martin (Jr.)	
Marcus Melton	

Instructor Signature: Robert Erickson Date: 2/3/17

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Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Mark Hoppe	ABSENT
Mark Resop	Mark Resop
Mark Zuge	ABSENT
Mason Schwoerer	
Matt Ceman	Matt Ceman
Matt Erickson	Matt Erickson
Melanie Ziemer	Melanie Ziemer
Micah Gumness	P/T ABSENT
Mike Bargender	Michael Bargender
Michael Cacchione	ABSENT

Instructor Signature: Robert Erickson Date: 2/3/17

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Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Michael La Pointe	
Michael Powell	
Michael Reed	
Milton Smith	
Nathaniel Krings	
Nicholas Blomberg	
Paul Kasuboski	
Rick DeKeyser	
Rich Rozek	
Roger Morin	

Instructor Signature: Robert Enders Date: 2/3/17

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Pickett, WI 54964
Call 920.233.3039
Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Ron Boraders	Ron Boraders
Russ Hackbarth	
Ryan Behnke	Ryan Behnke
Ryley Dittel	
Scott Wesenberg	ABSENT
Scott Thacker	
Shane Rabe	
Steve Plantz	ABSENT
TJ Whisnant	
Tim Witzlib	

Instructor Signature: Robert Erickson Date: 2/3/17

Quality Paint and Coatings
6610 State Road 44
P.O. Box 279
Pickett, WI 54964
Call 920.233.3039
Fax 920.230.2005

Training Roster

Type/Name of Training: Hazardous Waste / Material Training

Location of Training: Clairville Facility

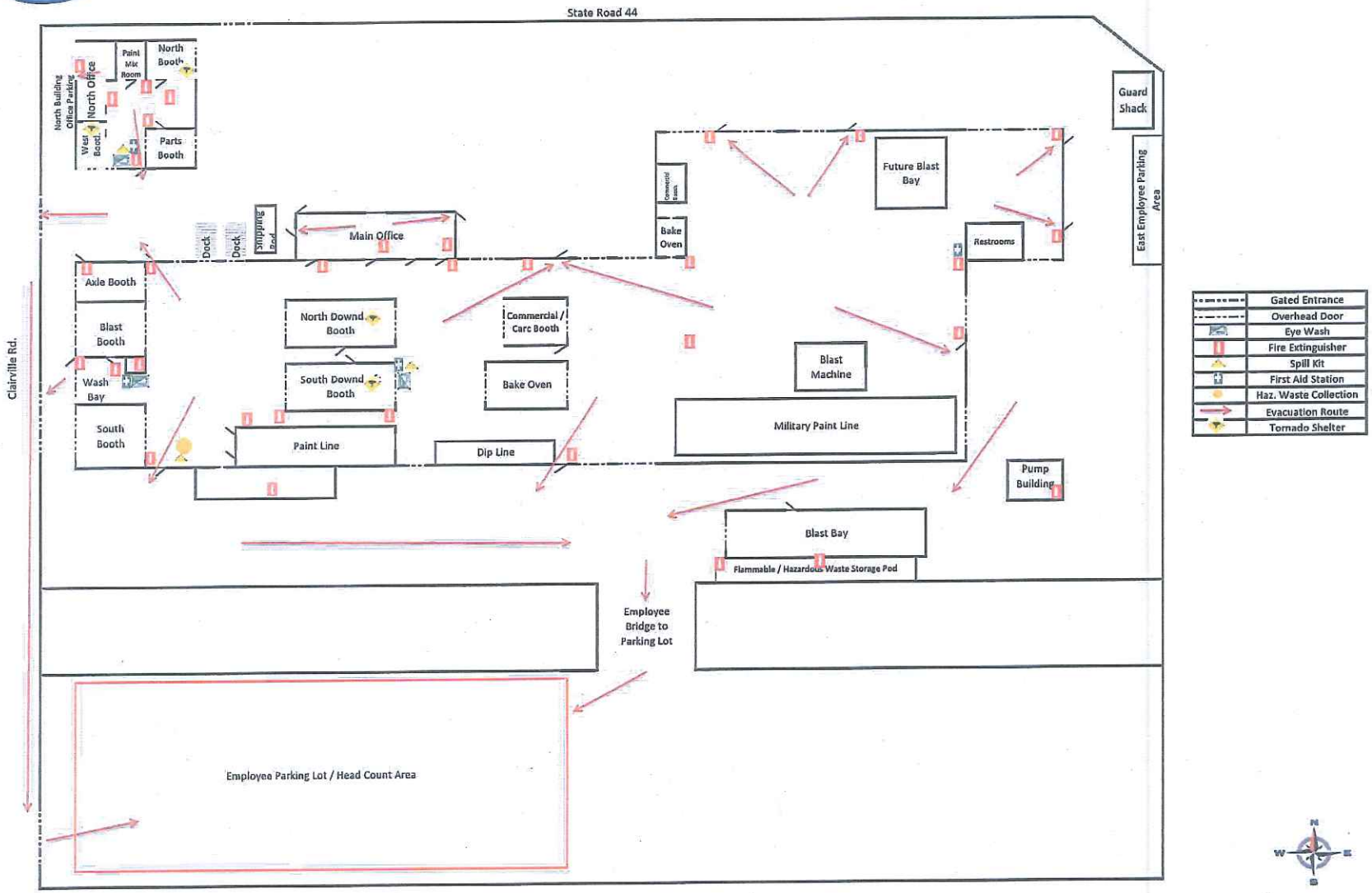
Date of Training: 2/3/17 Length of Time: 1.5 Hours

Instructor:

Name	Signature
Todd Beck	
Todd Raminger	
Todd Morey	
Vicky Roehl	
Vicky Hilgart	
TANYA KEECH	

Instructor Signature: Robert Einhorn Date: 2/3/17

Quality Paint and Coatings Emergency Map



QUALITY PAINT AND COATINGS

Emergency Response/Contingency Plan

1.1 Emergency Phone Numbers *

Fire	9-1-1	*Please Be Prepared to give the following address:*
Ambulance	9-1-1	***Quality Paint and Coatings***
Police	9-1-1	***2236 Clairville Rd***
		Oshkosh, WI 54904
		920-233-3039

* When calling, state the nature of the emergency, whether hazardous waste fire, explosion, spill or release to the environment and if injuries have occurred.

1.2 Company Emergency Contacts

Title	Name	Cell
Emergency Coordinator	Dave Knepfel	920-279-5999
Alternative Emergency Coordinator	Jarmen Walter	920-410-3621
Alternative Emergency Coordinator	Rich Rozek	920-420-3120

1.1.3 Other Emergency Numbers

Nekimi Vol.Fire Dept.	920-589-6281
Oshkosh Fire Department	920-236-5240
Winnebago County Police	920-236-7300
Oshkosh City Police	920-236-5700
Mercy Medical Center	920-223-2000
Aurora Health Care	920-456-6000
Safety Kleen	1-888-375-5336

1.1.4 Governmental Agency Numbers

Wiscosnin DNR Emergency Spill Reporting	1-800-943-0003
National Response Center/EPA Hotline	1-800-424-8802

SAFETY ORIENTATION CHECKLIST

Employee Name:_____

Position:

Prepper ___	Blaster ___	Maintenance ___
Material Handling ___	Office ___	Supply Chain Office ___
Painter, Commerc. ___	Painter, Military ___	Quality Control ___
Welder ___	Driver ___	Other _____ ___

Facility / Area New Hire will be working: Clairville Supervisor: _____

QPC Safety goals, policies

Incident & Injury reporting

PPE use (general)
PPE use (job specific)

Fork lift traffic

Fire Prevention & Extinguisher Use

Chemical use, OSHA Haz. Comm. Standard

Hazardous Waste Disposal / Handling

Emergency Procedures
(tornados, fires, evacuations)

Job-specific hazards (i.e.-blasting, fall protection)
(PPE requirements, emergency procedures)

My signature directly below indicates that the above information has been discussed and demonstrated with me. I agree to follow the rules and procedures presented to me today. I realize if I don't understand a hazard or safety requirement when I start working in my job, I should ask a manager or supervisor before beginning any assigned task. I agree to report any injuries, incidents or unsafe situations/practices to my supervisor/manager as soon as possible after the occurrence.

_____ _____
(employee) (date)

_____ _____
(EHS Coordinator) (date)

~ our name describes our service! ~

QUALITY SYSTEM FORM

QSF 620-1-D TRAINING ATTENDANCE RECORD

Owner	HR Manager	Revision	0
Approvers	HR Manager	Date	12/7/2011

SUMMARY

Type/Name of Training:	**Hazardous Waste disposal**		
Location of Training:	**Clairville**		
Date of Training:	**11/12/2015**		
Start Time:	**7:00 am**	**End Time:**	Click here to enter time.
Facilitator:	**Bob Erickson**		

ATTENDEES

NAME	ID	SIGNATURE
Clarence Curtis	CC6245	Clarence Curtis
Ronald Borders	RB6871	Ronald Borders
Jeff Scruton	JS4178	Jeff Scruton
Justin Charnas	JC4166	
Brad Knill	BK5401	
MICHAEL LAPOINTE	ML 2382	Michael LaPointe
JERRY MAZE	JM1687	Jerry Maze
Mark Zuge	MZ5009	
JJ Stelter	JS5400	
Joe Schettle		Joseph Schettle

Instructor Signature: Bob Erickson Date: 11/12/2015

Note to Instructor: Please forward the completed record to the HR team for entry into the training matrix.

~ our name describes our service! ~

QUALITY SYSTEM FORM

QSF 620-1-D TRAINING ATTENDANCE RECORD

Owner	HR Manager	Revision	0
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SUMMARY

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Location of Training:	**Clairville**		
Date of Training:	**11/12/2015**		
Start Time:	**7:00 am**	**End Time:**	Click here to enter time.
Facilitator:	**Bob Erickson**		

ATTENDEES

NAME	ID	SIGNATURE
Vicky Meloche	JH4500	Vicky Meloche
Jason Williams		Jason Williams
Anna Butschke		Anna Butschke
Roger Morin	RM6875	Roger Morin
Andrew Feider	AF0444	Andrew Feider
Iris Kimble		Iris Kimble
Doug Werner		Doug Werner
Scott M. Thacker		Scott M. Thacker
Gus Molitor	GM9412	Gus Molitor
Chris Reissman	CR3796	Chris Reissman
Joseph Lucksinger	JL4887	Joseph Lucksinger
Todd Mokay	TM 1465	Todd Mokay

Instructor Signature: Bob Erickson Date: 11/12/15

Note to Instructor: Please forward the completed record to the HR team for entry into the training matrix.

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QUALITY SYSTEM FORM

QSF 620-1-D TRAINING ATTENDANCE RECORD

Owner	HR Manager	Revision	0
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SUMMARY

Type/Name of Training:	**Hazardous Waste disposal**		
Location of Training:	**Clairville**		
Date of Training:	**11/12/2015**		
Start Time:	**7:00 am**	**End Time:**	Click here to enter time.
Facilitator:	**Bob Erickson**		

ATTENDEES

NAME	ID	SIGNATURE
James Orzel	JO 6600	James Orzel
Jamie Braasch	JB 3233	Jamie Braasch
Frank Mallett	369469	Frank Mallett
David Rustad	5633	
Carl Strege	CS6731	Carl Strege
David Decker	DD3555	
James Wilke	JW 3018	
Andy Olson	AO 3456	
Jason Bretzl	JB 3137	
Sean Owens	SO 4151	
Eugene Martin	LM 294	
Matt Erickson	ME 5285	

Instructor Signature: Bob Erickson Date: 11/12/15

Note to Instructor: Please forward the completed record to the HR team for entry into the training matrix.

CHEMISTS
ENGINEERS

BADGER LABORATORIES & ENGINEERING INC.
501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4868 • EST. 1966
(920) 729-1100 • FAX (920) 729-4945 • 1-800-776-7196

QUALITY PAINT & COATINGS
2236 CLAIRVILLE RD
OSHKOSH, WI 54904-

Report Number: 17002143
Report Date: 2/14/2017
Sampled By: Client

Attn: RICH ROZEK, DAVE KNEPFEL

Samples: 1 WASTEWATER

Sample Number: 47004716
Description: CHROME-1
Sample Date: 2/6/2017
Date Received: 2/6/2017

Parameter	Results	Units	LOD	LOQ	Dil.	Method	Analyzed	Codes
CHROMIUM,TOTAL REC	124	mg/l	2.6	8.7	128	SM3111D	02/14/17	
METALS DIGESTION	DONE		0	0		EPA200.2	02/13/17	

All LOD/LOQs adjusted for dilution and/or solids content.

BADGER LABS & ENGINEERING
WDNR Certified Lab #445023150
Approved By:

Amanda Vordus

BLE:rt

CHEMISTS
ENGINEERS

BADGER LABORATORIES & ENGINEERING, INC.

501 WEST BELL STREET - NEENAH, WISCONSIN 54956-4868 - EST. 1966
(920) 729-1100 - Fax (920) 729-4945 - 1-800-776-7196

SAMPLE RECEIPT FORM

17e0243

CLIENT INFORMATION

COMPANY: Quality Painted Coatings
NAME: Dave Knepfel
ADDRESS: 6610 State Rd 44
Pickett, WI 54964
FAX/PHONE/EMAIL: David.Knepfel@QPC.com
P.O. #:
PROJECT/SITE: 2236 Clairville Rd. Oshkosh, WI 54904
REPORT & BILL TO: QPC, 6610 State Rd 44, Pickett, WI 54964
ADDITIONAL REPORTS TO:

TURN AROUND TIME:
☑ Normal
☐ Other TAT*

*REQUIRES PRIOR LAB APPROVAL _____

SAMPLE TYPE:
☐ Groundwater
☐ Wastewater
☐ WPDES
☐ Cooling Water
☐ Drinking Water
☐ Solid Waste
☐ Oil
☐ Other _____
☐ Lab Filtered
☐ Field Filtered
☑ Grab
☐ Composite
☐ Flow Proportional
☐ Time Proportional

CUSTOMER SAMPLE ID	SAMPLE DATE/TIME	DATE REC'D	BL & E REPORT #	BL & E SAMPLE #	TEMP °	CONTAINERS	Ice Y/N	DELIVERY METHOD: BL&E	CLIENT	UPS	OTHER	PRESERVATION: PIF	PIL	NON-PRES	H2SO4	HNO3	NAOH	OTHER	ANALYTICAL REQUESTS	pH ok	EP
CHROME-1	2/6/17 9:40 AM	2/6	2173	4716		1	N		X				Y			1			TOTAL CHROME		

CHAIN OF CUSTODY RECORD

FILLED IN BY CUSTOMER
SAMPLED BY: Dave Knepfel
DATE/TIME SAMPLED: 2-6-17 / 9:40 Am
RELINQUISHED BY:

FILLED IN BY BADGER LABS & ENG
RECEIVED BY: at
DATE/TIME RECEIVED: 2-15-17 12:30
LOGGED IN: DB

* Temperature over 6°C are above EPA/DNR Protocol unless received on Ice.
* EP= If pH was not correct, extra preservation was added until correct pH was achieved; H2SO4/HNO3 adjusted to pH <2.0; NaOH >12.0
* PIF= Preserved in field.
* PIL= Preserved in lab.

ATTACHMENT D: Inspection Checklists

QUALITY PAINT & COATINGS, WI0 001 003 078, 1/31/2017 BK

LARGE QUANTITY GENERATOR INSPECTION

Revision: 08/15/2016
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	X	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	C	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	C	662.011(3)(a)1
D. Generator keeps records of any test results, waste analysis or other determinations for at least three years from the date the waste was last sent to a treatment, storage or disposal facility.	C	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	C	662.012

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	C	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	C	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	C	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	C	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	C	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	C	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	C	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.030
K. Hazardous waste is labeled according to applicable DOT requirements before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.031

LARGE QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Hazardous waste is marked according to applicable DOT requirements before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.032(2)
N. Placards are offered to the initial transporter. If no pretransportation activities are taking place during the inspection answer as 'NA'	C	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	C	668.07(1)
B. A copy of the LDR notification and certification shall be maintained on-site in the facility records for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	C	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	CA	668.03
D. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	C	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	NI	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	C	668.07(1)
H. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	C	668.07(1)(h)
I. Underlying hazardous constituents have been identified for characteristic wastes.	C	668.09(1)
J. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	C	668.09(2)
K. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	C	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	C	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NI	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	C	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	C	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	C	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	C	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	C	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	C	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A and leave questions 6.C to 6.G blank.	C	662.034(1)(d)
B. If generator has an amended SPCC plan or other emergency plan it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	NA	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	C	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	X	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	C	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	X	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	C	662.034(1)(d)

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A and leave questions 7.B to 7.I blank.	CA	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	C	662.034(1)(d)

LARGE QUANTITY GENERATOR INSPECTION

Section 7: Personnel Training Requirements

C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	C	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	C	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	C	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	C	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)). No 2016 Refresher	X	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	X	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	C	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9 and leave questions 8.B to 8.L blank.	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container.	C	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	C	662.034(1)(c)
D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NI	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	C	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	C	662.034(1)(a)1

LARGE QUANTITY GENERATOR INSPECTION

Section 8: 90-Day Container Accumulation

H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	C	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	C	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	C	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	C	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	C	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2) and leave questions 9.B to 9.H blank. 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)

Section 9: Subchapter BB Standards for Equipment Leaks

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1) and leave questions 10.B to 10.Q blank. 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y 1	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	NA	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	N	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	N	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	C	662.034(1)(a)1

LARGE QUANTITY GENERATOR INSPECTION

Section 10: Subchapter CC Level 1 Container Standards

I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	NA	662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	NI	662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	Y	662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	NI	662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	NI	662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	NA	662.034(1)(a)1
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	NA	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12 and leave questions 11.B to 11.M blank.	N	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2

Section 11: Subchapter CC Level 2 Container Standards

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13 and leave questions 12.B to 12.E blank.	N	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14 and leave questions 13.B to 13.I blank.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	C	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	C	662.034(3)(a)
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	C	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NI	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	CA/R	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	C	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	C	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	C	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	C	662.027(1)

LARGE QUANTITY GENERATOR INSPECTION

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16 and leave questions 15.B to 15.H blank.	N	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2)
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling arrangement.		679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.		679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.		679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.		679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17 and leave questions 16.B to 6.M blank Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y1	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	C	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	NI	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	X	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	ND	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	NI	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NI	673.15(2)

LARGE QUANTITY GENERATOR INSPECTION

Section 16: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	ND	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	C	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	NA	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	C	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NI	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	NA	

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18 and leave questions 17.B to 17.L blank.	N	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b

Section 17: F006 Wastewater Treatment Sludge

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	C	662.034(1)
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	✓	
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.		662.034(1)(a)2

LAND AND CHEMICALS DIVISION

Type of Document: Notice of Violation

Name of Document: Quality Paint & Coatings, WIO 001 003 078

	NAMES	DATE
AUTHOR:	Brian Kennedy	3/16/17
SECTION APA:		
SECTION CHIEF:	J. Morris (email)	3/23/17
BRANCH APA:	G. Cuerington (email)	3/23/17
BRANCH CHIEF:	JM for GV	3/31/17
DIVISION APA:	X	
DIVISION DIRECTOR:	X	
OTHERS:	Chuck Mikalian, OPC (email)	3/17/17
DRA:		
RA:		

RETURN TO: Brian Kennedy

PHONE: 3-4383

COMMENTS:

For contingency plan, personnel training, waste determination, and universal waste issues. Formal action possible pending company response.